Exhibit 19

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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HUNTAIR, INC.)
Plaintiff,) Case No. 07 C 6890
VS.) The Honorable Judge Coar
CLIMATECRAFT, INC.) Magistrate Judge Denlow
Defendant.)

HUNTAIR, INC.'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

Plaintiff Huntair, Inc. ("Huntair") provides the following Disclosure of Asserted Claims and Infringement Contentions in compliance with the Scheduling Order in this case and the Notification of Docket Entry dated February 21, 2008. Huntair reserves the right to amend this disclosure to conform to the results of ongoing discovery.

ASSERTED CLAIMS

- 1. U.S. Patent No. 7,137,775 ("the '775 patent"): Claims 1, 2, 4, 5, 6, 7, 9, 11, 12, 14 and 15.
- 2. U.S. Patent No. 7,179,046 ("the '046 patent"): Claims 1, 6, 8, 9, 10, 12, 14, 15 and 19.

ACCUSED INSTRUMENTALITIES

ClimateCraft's Fan Array Products are currently accused of infringing the asserted claims of the '775 and '046 patents listed above. "ClimateCraft's Fan Array Products" mean all fan array or fan matrix products or systems manufactured, marketed or sold by ClimateCraft, including, but not limited to, the fan array system referred to by ClimateCraft as "Matrix" and the fan system that is the subject of ClimateCraft's bid to obtain a contract to install an array of fans in the Northwest Community Hospital, located in Arlington Heights, Illinois.

<u>INFRINGEMENT</u>

Infringement charts for the '775 patent are attached hereto as Exhibit A. Infringement charts for the '046 patent are attached hereto as Exhibit B. Unless otherwise noted in the infringement charts, all claim elements and limitations are considered to be literally infringed by ClimateCraft's Fan Array Products. Huntair reserves the right to assert infringement under the doctrine of equivalents for any limitation of the '775 or '046 patents that ClimateCraft contends is not literally present in its Fan Array Products. Huntair further reserves the right to assert

infringement under the doctrine of equivalents based on a claim construction ruling on any disputed claim terms and/or based on further information that may become available during ongoing discovery.

Respectfully submitted,

Dated: March 17, 2008

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of March, 2008, a true and correct copy of the foregoing document, HUNTAIR, INC.'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS, was served via U.S. Mail, first-class postage pre-paid (with a courtesy copy be e-mail) to the following counsel for ClimateCraft, Inc.:

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EXHIBIT A

U.S. Patent No. 7,137,775 Infringement Claim Chart

U.S. Patent No. 7,137,775 B2	Infringement Contentions
1. A fan array fan section in an air-	ClimateCraft's Fan Array Products have a fan array
handling system comprising:	fan section in an air-handling system. See, e.g., CL
	1250-1341; 1437-1521.
(a) at least six fan units;	ClimateCraft's Fan Array Products have at least six
	fan units. See, e.g., CL 1251-1252; 1438-1440.
(b) said at least six fan units arranged in a	ClimateCraft's Fan Array Products have the least six
fan array;	fan units arranged in a fan array. See, e.g., CL 1251-
	1252; 1438-1440; ClimateCraft's Response to
	Interrogatory No. 1.
(c) an air-handling compartment within	ClimateCraft's Fan Array Products have an air-
which said fan array of fan units is	handling compartment within which said fan array of
positioned; and	fan units is positioned. See, e.g., CL 1251-1252;
	1438-1440.
(d) an array controller for controlling said	The ClimateCraft Fan Array system at Northwest
at least six fan units to run at	Community Hospital ("NCH") includes a
substantially peak efficiency by	Programmable Logic Controller ("PLC"), which
strategically turning selective ones of	communicates with the Building Automation System
said at least six fan units on and off,	("BAS") which may constitute an array controller
wherein each fan unit has a peak	for controlling said at least six fan units to run at
efficiency operating range outside of	substantially peak efficiency by strategically turning selective ones of said at least six fan units on and
which it operates at a reduced efficiency, and wherein said array controller is	off, wherein each fan unit has a peak efficiency
programmed to operate said at least six	operating range outside of which it operates at a
fan units at substantially peak efficiency	reduced efficiency, and wherein said array controller
by strategically turning off at least one	is programmed to operate said at least six fan units at
fan unit operating at reduced efficiency	substantially peak efficiency by strategically turning
and running the remaining fan units	off at least one fan unit operating at reduced
within said peak efficiency operating	efficiency and running the remaining fan units
range.	within said peak efficiency operating range. See,
	e.g., NCH Specification, § 2.15; CL 1250-1341;
	1437-1521; ClimateCraft's Response to
	Interrogatory No. 1.
2. The fan array fan section in an air-	In ClimateCraft's Fan Array Products, the at least
handling system of claim 1, wherein said	six fan units are plenum fans. See, e.g., CL 1254;
at least six fan units are plenum fans.	1442.
4. The fan array fan section in an air-	In ClimateCraft's Fan Array Products, the at least
handling system of claim 1, wherein said	six fan units are a plurality of fan units arranged in a
at least six fan units are a plurality of fan	fan array configuration that is a true array
units arranged in a fan array	configuration. See, e.g., CL 1251-1254; 1438-1442.
configuration selected from the group	
consisting of:	

U.S. Patent No. 7,137,775 B2	Infringement Contentions
(a) a true array configuration;	A CONTROL OF THE PROPERTY OF T
(b) a spaced pattern array configuration;	
(c) a checker board array configuration;	
(d) rows slightly offset array	
configuration;	
(e) columns slightly offset array	
configuration; and	
(f) a staggered array configuration.	
5. The fan array fan section in an air-	In ClimateCraft's Fan Array Products, the at least
handling system of claim 1, wherein said	six fan units include at least two vertically arranged
at least six fan units include at least two	fan units. See, e.g., CL 1251-1252; 1438-1440.
vertically arranged fan units.	, 6,7
6. The fan array fan section in an air-	In ClimateCraft's Fan Array Products, each of the at
handling system of claim 1, wherein each	least six fan units is positioned within a fan unit
of said at least six fan units is positioned	chamber. See, e.g., CL 1251-1252; 1438-1440.
within a fan unit chamber.	
7. The fan array fan section in an air-	In ClimateCraft's Fan Array Products, each of the at
handling system of claim 1, wherein each	least six fan units is suspended within a respective
of said at least six fan units is suspended	said fan unit chamber such that there is an air relief
within a respective said fan unit chamber	passage there below. See, e.g., CL 1251-1252;
such that there is an air relief passage	1438-1440.
there below.	
9. The fan array fan section in an air-	In ClimateCraft's Fan Array Products, each of the at
handling system of claim 1, wherein each	least six fan units are mounted in a grid system. See,
of said at least six fan units are mounted	e.g., CL 1251-1254; 1438-1442.
in a grid system.	
11. The fan array fan section in an air-	ClimateCraft's Fan Array Products further comprise
handling system of claim 1, further	an array of backdraft dampeners, each backdraft
comprising an array of backdraft	dampener in line with a respective fan unit. See,
dampeners, each backdraft dampener in	e.g., CL 1254; 1442.
line with a respective fan unit.	
12. The fan array fan section in an air-	The ClimateCraft Fan Array system at NCH
handling system of claim 1, said array	includes a PLC, which communicates with the BAS
controller is programmed to operate said	which may be programmed to operate said at least
at least six fan units at peak efficiency for	six fan units at peak efficiency for a performance
a performance level based on a criteria	level based on a criteria selected from the following
selected from the following group of	group of criteria:
criteria:	(a) air volume;
(a) air volume;	(b) level of air flow;
(b) level of air flow; (c) pattern of air flow; and	(c) pattern of air flow; and
TREE CALLETO OF SIT HOW! SNA	(d) number of fan units to operate.
1 ' ' -	ļ · ·
(d) number of fan units to operate.	See, e.g., NCH Specification, § 2.04.
(d) number of fan units to operate. 14. The fan array fan section in an air-	See, e.g., NCH Specification, § 2.04. The ClimateCraft Fan Array system at NCH
(d) number of fan units to operate.	See, e.g., NCH Specification, § 2.04.

U.S. Patent No. 7,137,775 B2	Infringement Contentions
control the speed of each of said at least	speed of each of said at least six fan units to run at
six fan units to run at substantially peak	substantially peak efficiency. See, e.g., NCH
efficiency.	Specification, § 2.15; CL 1250-1341; 1437-1521;
	ClimateCraft's Response to Interrogatory No. 1.
15. The fan array fan section in an air-	In ClimateCraft's Fan Array Products, the air-
handling system of claim 1, said air-	handling compartment is positionable within a
handling compartment positionable	structure such that said air-handling system
within a structure such that said air-	conditions the air of said structure. See, e.g., CL
handling system conditions the air of said	1250-1341; 1437-1521.
structure.	

EXHIBIT B

U.S. Patent No. 7,179,046 Infringement Claim Chart

U.S. Patent No. 7,179,046 B2	Infringement Contentions
1. A fan array fan section in an air-	Climate Craft's Fan Array Products have a fan array
handling system comprising:	fan section in an air-handling system. See, e.g., CL
	1250-1341; 1437-1521.
(a) an air-handling compartment;	Climate Craft's Fan Array Products have an air-
	handling compartment. See, e.g., CL 1251-1254;
	1438-1442.
(b) a plurality of fan units;	Climate Craft's Fan Array Products have a plurality
	of fan units. See, e.g., CL 1251-1254; 1438-1442.
(c) said plurality of fan units arranged in	Climate Craft's Fan Array Products have said
a fan array;	plurality of fan units arranged in a fan array. See,
	e.g., CL 1251-1252; 1438-1440.
(d) said fan array positioned within said	Climate Craft's Fan Array Products have said fan
air-handling compartment;	array positioned within said air-handling
	compartment. See, e.g., CL 1251-1252; 1438-1440.
(e) said air-handling compartment	Climate Craft's Fan Array Products have said air-
associated with a structure such that said	handling compartment associated with a structure
air-handling system conditions the air of	such that said air-handling system conditions the air
said structure; and	of said structure. See, e.g., CL 1250-1341; 1437-
,	1521.
(f) a control system for operating said	Climate Craft's Fan Array Products have a control
plurality of fan units at substantially peak	system for operating said plurality of fan units at
efficiency by strategically turning on and	substantially peak efficiency by strategically turning
off selective ones of said plurality of fan	on and off selective ones of said plurality of fan
units.	units. See, e.g., CL 1261-1266; 1449-1452.
6. The fan array fan section in an air-	In Climate Craft's Fan Array Products, the plurality
handling system of claim 1, wherein said	of fan units are plenum fans. See, e.g., CL 1254;
plurality of fan units are plenum fans.	1442.
8. The fan array fan section in an air-	In Climate Craft's Fan Array Products, the plurality
handling system of claim 1, wherein said	of fan units are arranged in a fan array configuration
plurality of fan units are arranged in a fan	that is a true array configuration. See, e.g., CL 1251-
array configuration selected from the	1254; 1438-1442.
group consisting of:	
(a) a true array configuration;	
(b) a spaced pattern array configuration;	
(c) a checker board array configuration;	
(d) rows slightly offset array	
configuration;	
(e) columns slightly offset array	
configuration; and	
(f) a staggered array configuration.	
9. The fan array fan section in an air-	In Climate Craft's Fan Array Products, the plurality

U.S. Patent No. 7,179,046 B2	Infringement Contentions
handling system of claim 1, wherein each	of fan units is positioned within a fan unit chamber.
of said plurality of fan units is positioned	See, e.g., CL 1251-1252; 1438-1440.
within a fan unit chamber.	
10. The fan array fan section in an air-	In Climate Craft's Fan Array Products, each of the
handling system of claim 1, wherein each	plurality of fan units is suspended within a
of said plurality of fan units is suspended	respective said fan unit chamber such that there is an
within a respective said fan unit chamber	air relief passage therebelow. See, e.g., CL 1251-
such that there is an air relief passage	1252; 1438-1440.
therebelow.	
12. The fan array fan section in an air-	In Climate Craft's Fan Array Products, each of the
handling system of claim 1, wherein each	plurality of fan units is mounted in a grid system.
of said plurality of fan units is mounted	See, e.g., See, e.g., CL 1251-1254; 1438-1442.
in a grid system.	111, 18, 111, 18, 111
14. The fan array fan section in an air-	ClimateCraft's Fan Array Products further comprise
handling system of claim 1, further	an array of backdraft dampeners, each backdraft
comprising an array of backdraft	dampener in line with a respective fan unit. See,
dampeners, each backdraft dampener in	e.g., CL 1254; 1442.
line with a respective fan unit.	
15. A fan array fan section in an air-	Climate Craft's Fan Array Products have a fan array
handling system comprising:	fan section in an air-handling system. See, e.g., CL
initialing system comprising.	1250-1341; 1437-1521.
(a) an air-handling compartment;	Climate Craft's Fan Array Products have an air-
(a) an an mananing comparantent,	handling compartment. See, e.g., CL 1251-1254; CL
	1438-1442.
(b) a plurality of fan units;	Climate Craft's Fan Array Products have a plurality
(o) a planting of tan anne,	of fan units. See, e.g., CL 1251-1254; 1438-1442.
(c) said plurality of fan units arranged in	Climate Craft's Fan Array Products have said
a fan array;	plurality of fan units arranged in a fan array. See,
, ·	e.g., CL 1251-1252; 1438-1440.
(d) said fan array positioned within said	Climate Craft's Fan Array Products have said fan
air-handling compartment;	array positioned within said air-handling
air mananing comparations,	compartment. See, e.g., CL 1251-1252; 1438-1440.
(e) said air-handling compartment	Climate Craft's Fan Array Products have said air-
association with a structure such that the	handling compartment associated with a structure
said air-handling system conditions the	such that the said air-handling system conditions the
air of said structure; and	air of said structure. See, e.g., CL 1250-1341; 1437-
an or said structure, and	1521.
(f) a control system for controlling said	Climate Craft's Fan Array Products have a control
plurality of fan units, said control system	system for controlling said plurality of fan units, said
allowing control of the speed of the fan	control system allowing control of the speed of the
	fan units in said plurality of fan units such that they
units in said plurality of fan units such	
that they run at substantially peak	run at substantially peak efficiency. See, e.g., CL
efficiency.	1261-1266; 1449-1452.
19. A fan array fan section in an air-	Climate Craft's Fan Array Products have a fan array
handling system comprising:	fan section in an air-handling system. See, e.g., CL

U.S. Patent No. 7,179,046 B2	Infringement Contentions
	1250-1341; 1437-1521.
(a) an air-handling compartment;	Climate Craft's Fan Array Products have an airhandling compartment. <i>See</i> , <i>e.g.</i> , CL 1251-1254; 1438-1440.
(b) a plurality of independently controllable fan units;	Climate Craft's Fan Array Products have a plurality of independently controllable fan units. <i>See, e.g.</i> , CL 1251-1254; 1261-1266; 1438-1442; 1449-1452.
(c) said plurality of fan units arranged in a fan array;	Climate Craft's Fan Array Products have said plurality of fan units arranged in a fan array. <i>See</i> , e.g., CL 1251-1252; 1438-1440.
(d) said fan array positioned within said air-handling compartment;	Climate Craft's Fan Array Products have said fan array positioned within said air-handling compartment. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
(e) said air-handling compartment associated with a structure such that the said air-handling system conditions the air of said structure;	Climate Craft's Fan Array Products have said airhandling compartment associated with a structure such that the said air-handling system conditions the air of said structure. <i>See, e.g.</i> , CL 1250-1341; 1438-1442.
(f) a control system for controlling the speed of the fan units in said plurality of fan units such that they run at substantially peak efficiency.	Climate Craft's Fan Array Products have a control system for controlling the speed of the fan units in said plurality of fan units such that they run at substantially peak efficiency. See, e.g., CL 1261-1266; 1449-1452.